



Industrial Telecommunications Association, Inc.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

February 10, 1995

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20054

DOCKET FILE COPY ORIGINAL

Re: Council of Independent Communication Suppliers;
Petition for Rule Making Seeking to Eliminate the
Frequency Coordination Requirement for the Frequencies
154.570 MHz and 154.600 MHz

Dear Mr. Caton:

On behalf of the Council of Independent Communication Suppliers, a market council of the Industrial Telecommunications Association, Inc. (ITA), I am hereby transmitting for filing with the Commission the original and nine copies of the above-referenced Petition for Rule Making.

In accordance with Section 1.401 of the FCC's Rules and Regulations, please accept this Petition for Rule Making for filing.

Very truly yours,

Frederick J. Day

Frederick J. Day
Executive Director
Government Relations

Enclosure

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Formerly STRA the Special Industrial Radio Service Association, Inc.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)

Amendment of Part 90)
of the Commission's)
Rules to Permit the)
Licensing of Mobile)
Operations on the)
Frequencies 154.570 MHz)
and 154.600 MHz without)
Prior Frequency)
Coordination)

RM- _____

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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To: The Commission

PETITION FOR RULE MAKING
OF THE
COUNCIL OF INDEPENDENT COMMUNICATION SUPPLIERS

The Council of Independent Communication Suppliers ("CICS"), pursuant to Section 1.401 of the Rules and Regulations of the Federal Communications Commission ("FCC" or "Commission"), hereby respectfully submits this Petition for Rule Making seeking to permit the routine licensing of mobile operations on the frequencies 154.570 MHz and 154.600 MHz without prior frequency coordination.

I. PRELIMINARY STATEMENT

1. CICS is an unincorporated association of entities engaged in serving the needs of private radio eligibles, particularly those located in small and rural communities throughout the United States. CICS' membership is open to SMR operators, radio dealers, equipment suppliers, communications engineers and consultants.

CICS was formed to provide these entities a voice in the policy-making process governing use of the electromagnetic spectrum, especially spectrum allocated to the Private Land Mobile Radio Services. CICS is an independent market council of the Industrial Telecommunications Association ("ITA").

II. BACKGROUND

2. The frequencies 154.570 MHz and 154.600 MHz are available to entities eligible in the Business Radio Service and, on a secondary basis, to entities eligible in the Forest Products Radio Service. Under Sections 90.75(c)(4), operations on these frequencies are limited to a maximum output power of 2 watts and each station is classified and licensed as a mobile station.

III. PROPOSAL

3. In view of the low-power character of operations on 154.570 MHz and 154.600 MHz, and the mobile nature of the stations authorized, there is little benefit to be gained by requiring licensees to obtain frequency coordination before filing applications with the FCC. The 2-watt limitation minimizes the potential for stations authorized on these frequencies to cause harmful interference to systems operating on the same channel or adjacent channels. Moreover, because licensees may use the frequencies on a mobile basis, such as for mobile repeaters, there is little benefit to be gained by frequency coordination.

Accordingly, the petitioner believes there is merit in exempting operations on the frequencies 154.570 MHz and 154.600 MHz from the frequency coordination requirement.

4. The petitioner proposes to amend Section 90.175 of the rules to exempt applications for 154.570 MHz and 154.600 MHz from the frequency coordination requirement. As discussed above, the licensing of stations for mobile operations dilutes many of the customary benefits of frequency coordination. Other users of the frequencies do not receive any assurance of protection or lessened interference because the interference potential, to the extent it may exist, will be random and unpredictable. In any event, the limitation on output power that is an essential condition of licensing stations on 154.570 MHz and 154.600 MHz minimizes the potential for interference to other users.

5. Under these conditions, the frequency coordination requirement for 154.570 MHz and 154.600 MHz does not assist the spectrum management process. There is no real benefit to be derived from frequency coordination and, therefore, no compelling reason to retain the coordination requirement. Accordingly, CICS requests that the Commission initiate a rule making proceeding to eliminate the coordination requirement. To effect this change, the petitioner proposes to amend Section 90.175(f) in the manner indicated in the attached Appendix.

IV. CONCLUSION

6. For the reasons stated above, CICS respectfully requests the Commission to initiate a rule making proceeding aimed at eliminating the frequency coordination requirement for applications proposing to use 154.570 MHz and 154.600 MHz. The petitioner believes that implementation of this change will promote the public interest by saving time and expense for applicants. The suggested change will enable users to begin operations on these two frequencies more quickly.

WHEREFORE, THE PREMISES CONSIDERED, the Council of Independent Communication Suppliers respectfully submits this Petition for Rule Making and urges the Federal Communications Commission to proceed to place the Petition for Rule Making on Public Notice in accordance with Section 1.403 of the Commission's Rules and Regulations.

**COUNCIL OF INDEPENDENT
COMMUNICATION SUPPLIERS**

By:


Andrew Daskalakis
Chairman

Prepared by:

Mark E. Crosby
Frederick J. Day, Esq.
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Date: February 10, 1995

Appendix: Text of Proposed Rule Changes

APPENDIX

It is requested that the Federal Communications Commission amend Part 90 of its Rules and Regulations as shown:

Part 90 is proposed to be amending by revising Section 90.175 as follows:

§ 90.175 Frequency coordination requirements.

* * * * *

(f) The following applications need not be accompanied by evidence of frequency coordination:

* * * * *

- (5) Applications in the Special Industrial Radio Service or the Business Radio Service requesting a frequency designated for itinerant operation only, and applications in the Business Radio Service or Forest Products Radio Service proposing to establish low-power operations on the frequencies 154.570 MHz and 154.600 MHz.

* * * * *